UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)

This document relates to:
Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 1:04-cv-01076 (GBD)(SN)

DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD
ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"); Plaintiffs added as parties pursuant to the Court's May 4, 2022, June 15, 2022, June 28, 2022, August 30, 2022, and October 31, 2022 Orders (ECF Nos. 7949, 8111, 8150, 8473, and 8695) and the one hundred and forty-six (146) proposed Additional Plaintiffs listed on Exhibit A (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a list of the plaintiffs to be added to the pending litigation in this case against the Taliban ("Additional Plaintiffs").

3. While Anderson Kill P.C. intended to cease accepting new clients against the Taliban, individuals subsequently contacted undersigned counsel and requested to join the litigation.

4. If this motion is granted, undersigned counsel intends to promptly move for a damages judgment against the Taliban on behalf of these additional plaintiffs.

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WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Additional Plaintiffs Against the Taliban.

Dated: May 27, 2025
         New York, New York

/s/ Jerry S. Goldman
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2

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